

MEMO ENDORSED

SULLIVAN &  
WORCESTERSullivan & Worcester LLP  
1633 Broadway  
New York, NY 10019T: 212 660 3000  
F: 212 660 3001  
[www.sandw.com](http://www.sandw.com)

April 13, 2015

The Hon. Andrew L. Carter, Jr.  
 United States District Judge  
 Southern District of New York  
 40 Foley Square, Room 435  
 New York, New York 10007

4-13-15

Re: *The Export-Import Bank of the Republic of China v. République du Niger*, 97 CIV 3090  
 (LAK)

Dear Judge Carter:

We represent judgment creditor The Export-Import Bank of the Republic of China (“Ex-Im Bank”). We write, on behalf of Ex-Im Bank and SOPAMIN, to request a three-day extension (to Thursday, April 16, 2015) to submit the joint status report on Ex-Im Bank’s discovery of SOPAMIN<sup>1</sup> that, pursuant to Your Honor’s April 2, 2015 order, is due today.

Ex-Im Bank has raised multiple discovery issues with SOPAMIN, and the parties are in the process of attempting to resolve those issues. However, there are still outstanding discovery issues that remain to be discussed. We expect that we will have more comprehensive information regarding these issues, including any resolution of the issues (if possible), to report to the Court by Thursday.

Respectfully submitted,

/s/ Paul E. Summit

Paul E. Summit

cc: Anthony Mavronicolas, Esq.  
 Patrick Croke, Esq.

Parties' application is GRANTED.  
 The joint status report from Ex-Im Bank and  
 SOPAMIN previously due April 13, 2015 is  
 now due April 16, 2015.

So Ordered.

*Andrew L. Carter*

4-13-15

<sup>1</sup> The parties continue to dispute the use of the term “discovery.” SOPAMIN characterizes the process as “voluntary disclosure,” but Ex-Im Bank rejects that characterization.